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18 MARY JEAN HONG

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 MARY JEAN HONG,

23 Plaintiff,

24 v.

25 RIGHT MANAGEMENT
26 CONSULTANTS, INC., DOES 1 through
27 100, inclusive,

28 Defendants.

Case No. C04 4011 PJH ENE

**SECOND JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
EXTENSION OF TIME TO COMPLETE
ENE SESSION**

Judge: Hon. Phyllis J. Hamilton
Trial: May 29, 2006

1 **WHEREAS**, Plaintiff Mary Jean Hong ("Plaintiff") and Defendant Right
2 Management Consultants, Inc. ("Defendant") (jointly referred to herein as the "Parties") agree that
3 extending the deadline for completing Early Neutral Evaluation ("ENE") to August 31 will afford
4 the Parties sufficient time to complete the necessary discovery, depositions, and prepare for a
5 meaningful and productive ENE session;

6 **WHEREAS**, the Parties were assigned to a new Evaluator on May 4, 2005.

7 **WHEREAS**, the Parties have discussed said extension with the new Evaluator,
8 Deborah Shefler, who agrees to keep this case and supports the Parties' position that it would be
9 premature to proceed with ENE at this time before certain written discovery and depositions have
10 been completed;

11 **WHEREAS**, both Parties have propounded and responded to written discovery in the
12 form of special interrogatories and document requests;

13 **WHEREAS**, the Parties have taken five hours of the Plaintiff's deposition, have
14 scheduled Jay Klein's deposition for June 8, and are selecting mutually convenient dates for the two-
15 hour continuation of Plaintiff's deposition, the deposition of Defendant's Person Most
16 Knowledgeable, the deposition of Nancy Czajkowski, and the deposition of Gail Weibley; and

17 **WHEREAS**, the aforementioned extension will not affect the May 29, 2006 trial date
18 or related pre-trial dates set by this Court, and it appears that good cause exists for the entry of an
19 Order extending the ENE deadline to August 31, 2005;

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IT IS SO STIPULATED.

By: /s/
JANINE R. HUDSON
THE LOUDERBACK LAW FIRM

Attorneys for Plaintiff
MARY JEAN HONG

By: /s/
GABRIEL S. LEVINE
LITTLER MENDELSON, P.C.
A Professional Corporation

Attorneys for Defendant
RIGHT MANAGEMENT
CONSULTANTS, INC.

By: 
HON. PHYLLIS J. HAMILTON
United States District Court Judge

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